

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

UNITED STATES, *et al.*,

*Plaintiffs,*

vs.

GOOGLE LLC,

*Defendant.*

No: 1:23-cv-00108-LMB-JFA

**DEFENDANT GOOGLE LLC'S NOTICE OF MOTION TO SEAL**

PLEASE TAKE NOTICE that Defendant Google LLC (“Google) filed a motion to seal certain exhibits and portions of its Opposition to the United States’ Motion for Partial Judgment on the Pleadings or, in the Alternative, a Protective Order, to restrict public access to those documents, as well as to redact certain portions of the Opposition that reference the contents of those exhibits (Docket no. 370). Pursuant to Local Civil Rule 5, Google hereby notifies Plaintiff United States, third-party News Corp, and any interested non-parties that they may submit memoranda in support of or in opposition to the motion within seven (7) days after the filing of the motion to seal, and that they may designate all or part of such memoranda as confidential. If no objection is filed in a timely manner, the Court may treat the motion as uncontested.

Dated: August 31, 2023

Respectfully submitted,

*/s/ Craig C. Reilly*  
Craig C. Reilly (VSB # 20942)  
THE LAW OFFICE OF  
CRAIG C. REILLY, ESQ.  
209 Madison Street  
Alexandria, VA 22314

Telephone: (703) 549-5354  
Facsimile: (703) 549-5355  
[craig.reilly@ccreillylaw.com](mailto:craig.reilly@ccreillylaw.com)

Eric Mahr (*pro hac vice*)  
Andrew Ewalt (*pro hac vice*)  
Julie Elmer (*pro hac vice*)  
Lauren Kaplin (*pro hac vice*)  
Jeanette Bayoumi (*pro hac vice*)  
Claire Leonard (*pro hac vice*)  
Sara Salem (*pro hac vice*)  
Tyler Garrett (VSB # 94759)  
FRESHFIELDS BRUCKHAUS  
DERINGER US LLP  
700 13th Street, NW, 10th Floor  
Washington, DC 20005  
Telephone: (202) 777-4500  
Facsimile: (202) 777-4555  
[eric.mahr@freshfields.com](mailto:eric.mahr@freshfields.com)

*Counsel for Defendant Google LLC*